

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

– against –

S4 10 Cr. 162 (KMW)

WESAM AL HANAFI, and

SABIRHAN HASANOFF

Defendants.

____X

MOTION TO ADMIT COUNSEL PRO HAC VICE

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Joshua L. Dratel, a member in good standing in the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Linda Moreno, Esq. Linda Moreno, P.A. PO Box 10985 Tampa, Florida 33679 813.247.4500

Linda Moreno is a member in good standing of the bar in the States of California (Bar #92854) and Florida (Bar #0112283). There are no pending disciplinary proceedings against Linda Moreno in any State or Federal Court.

Dated: 4/12 New York, NY

Respectfully submitted

Joshua L. Dratel SDNY Bar Code: JD4037

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Fax: 212-571-3792

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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– against –

S4 10 Cr. 162 (KMW)

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Defendants.

AFFIDAVIT OF JOSHUA L. DRATEL IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

Joshua L. Dratel, being duly sworn, hereby deposes and says as follows:

- 1. I am counsel for Defendant Hasanoff in the above captioned action.
- 2. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Linda Moreno as counsel pro hac vice to represent Defendant Hasanoff in this matter.
- 3. I am a member in good standing of the bar of the State of New York (#1795954), and was admitted to practice law on March 22, 1982. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
- 4. Ms. Moreno is counsel at the law office of Linda Moreno P.A. in Tampa, Florida.
- 5. I have found Ms. Moreno to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

Supreme Court of Florida Certificate of Good Standing

I THOMAS D. HALL, Clerk of the Supreme Court of the State of Florida, do hereby certify that

LINDA GAIL MORENO

was admitted as an attorney and counselor entitled to practice law in all the Courts of the State of Florida on June 27, 1997, is presently in good standing, and that the private and professional character of the attorney appear to be good.

WITNESS my hand and the Seal of the Supreme Court of Florida at Tallahassee,

the Capital, this March 24, 201

Chief Deputy Clerk

Clerk of the Supreme



Supreme Court of California

FREDERICK K. OHLRICH

Clerk of the Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT

OF THE

STATE OF CALIFORNIA

LINDA MORENO

I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that LINDA MORENO was on the 30th day of May, 1980, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.

Witness my hand and the seal of the court on the 24th day of March, 2011.

FRED.	<u>ERICK K. OHLRI</u>	CH_
		Clerk of the Supreme Court
By:	CCaQ	

Charles Cahoon, Deputy Clerk

AFFIRMATION OF SERVICE

JOSHUA L. DRATEL, pursuant to Title 28, United States Code, Section 1746, hereby declares under the penalty of perjury, that he is an attorney at the Law Offices of Joshua L. Dratel, P.C., and that, on AVALIZ 2011 he caused copies of this MOTION TO ADMIT COUNSEL PRO HAC VICE, to be served by e-mail on:

Brendan R. McGuire John P. Cronan Aimee Hector Assistant United States Attorneys for the Southern District of New York Tel.: (212) 637-2220/2779/2203

JaneAnne Murray, Esq. Murray Law LLC 233 Broadway New York, New York 11215 Tel.: (212) 941-9266 jmurray@murraylawny.com Attorney for Wesam El-Hanafi

Justine A. Harris, Esq. Colson & Harris LLP 10 East 40th Street, Suite 3307 New York, New York 10016 Tel.: (212) 257-6455 jharris@colsonharris.com Attorney for Wesam El-Hanafi

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

New York City, NY

ALICE L. FONTIER, ESQ.
NOTARY PUBLIC, State of New York
No. 02F06216436
Qualified in New York County
Commission Expires Jan. 19, 20 1/4

torney for Sabirhan Hasanoff

before ne on April 11, 2011